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Attorneys For The Plaintiffs
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - -	x	
CLAUDIA WOODARD AND ELISE	:	09-CIV-3000
LAWLESS,	:	AFFIDAVIT OF LAVERN GORDON
	:	
Plaintiffs,	:	
	:	
- against -	:	
	:	
TWC MEDIA SOLUTIONS, INC. and	:	
THE WEATHER CHANNEL,	:	
	:	
Defendants.	:	
- - - - -	x	

STATE OF NEW YORK)
 : ss.:
COUNTY OF NEW YORK)

LAVERN GORDON, being duly sworn, deposes and says:

1. I make this affidavit voluntarily, with complete understanding of its contents, knowing that it will be used in legal proceedings, and knowing that I am swearing to the truth of the statements made by me in this affidavit.

2. I am a woman of color. I am of Jamaican descent, heritage, ancestry and ethnicity. I have also been known as Lavern Broderick. I was employed by TWC Media Solutions, Inc./The Weather Channel ("TWC" or the "Company") for several years through 2006. My final position was Sales Coordinator. As a Sales Coordinator, I serviced and supported Account Managers, including among others, Paul Celt, a white male Account Manager.

3. I know Plaintiffs Claudia Woodard ("Ms. Woodard") and Elise Lawless ("Ms. Lawless"), former Account Managers at TWC. I was a Sales Coordinator during Ms. Woodard's employment. Ms. Woodard is an African American woman of color. Her national origin is Jamaican. She was professional and worked hard.

4. In 2004, Defendants were hiring Client Development Managers ("CDM"). I heard that Meade Camp (Senior Vice President for Client Development), was making statements to the effect that he needed to hire a black woman to fill a CDM position.

5. Ms. Woodard joined the Company in 2004 as Client Development Manager, reporting to Mr. Camp. Later, Ms. Woodard was transferred to the position of Account Manager and was assigned to report to Mark Gall, Senior Vice President for Eastern Regional Sales.

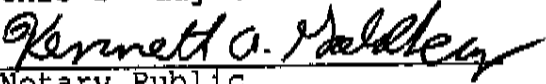
6. During a staff meeting in or about mid August 2004, Paul Celt commented that I was illegally tilling Jamaican rum in my home bathtub and bringing the rum to work. Ms. Woodard and other staff members attended this meeting and heard Mr. Celt's comment. I received emails from Ms. Woodard about Mr. Celt's conduct, copies of which are attached hereto as Exhibit A.

7. Well before Ms. Woodard joined the Company, Mr. Celt repeatedly made discriminatory comments to me about Jamaicans. Mr. Gall witnessed many of these comments that Mr. Celt made before Ms. Woodard joined the Company, and Mr. Gall did not take any action to stop Mr. Celt from making such comments.



Lavern Gordon

Sworn to before me
this 1st day of December 2009



Notary Public

KENNETH A. GOLDBERG
Notary Public, State of New York
No: 02305061877
Qualified in New York County
Commission Expires ~~June 10, 2010~~
July 27, 2010

EXHIBIT A

Incident #1

1 - 2

**Claudia
Woodard**

To: Claudia Woodard/TWC@TWC

cc: Lavern Gordon/TWC@TWC

08/18/2004
12:08 PM

bcc:

Subject: Re: How are you?

Lavern,

I am so-so, sorry you are subjected to this type of abuse on a daily basis. I am appalled that your boss/manager (as you have described him) has put you in this position. What a poor judgment call? He accuses you of illegally tilling Jamaican Rum in your bath-tub at home and bringing it to him at work all the time--in front of everyone.

You may feel that your job or relationship with your manager would be jeopardize by speaking out so, I have done do on your behalf.

Claudia Nelson-Woodard
Manager, Client Development
The Weather Channel Media Solutions
845 Third Avenue, New York, NY 10022
Phone: 212-893-2222
E. cwoodard@weather.com

Dangers of Raging Waters Highlighted on The Weather Channel
Flood week shows what happens when you ignore the power of water...

▼ Claudia Woodard

Claudia To: Claudia Woodard/TWC
Woodard cc: Lavern Gordon/TWC@TWC
Subject: Re: SHEEE! ☺
08/13/2004
09:59 AM

Didn't realize this was an every day thing!

All you said was that you wanted to be with clients as well and he took off with the whole Jamaican Tourism client bit. Did you notice how Craig Meadow jumped in and get ready to go ... That was unnecessary and you were justified in returning to the subject at hand. Keep doing that and they will begin to realize that you don't appreciate the Jamaican Jokes.



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2-2

You handled that well.

Claudia Nelson-Woodard
Manager, Client Development
The Weather Channel Media Solutions
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Flood week shows what happens when you ignore the power of water...

▼ Claudia Woodard

Claudia
Woodard To: Lavern Gordon/TWC
cc:
08/10/2004 Subject: SHEEE!
10:12 AM

Lavern,
I don't know if this was an isolated incident and furthermore, I am not at liberty to cast judgment. However, I found it unsettling that my colleagues spent over 30 minutes making off-color jokes yesterday about Jamaicans. I don't know about you but, I found Paul Celts comments to be unwelcome. I don't want to make a big deal about it so please don't say anything but, wanted you to know that I didn't participate because I felt uncomfortable.

Claudia Nelson-Woodard
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The Weather Channel Media Solutions
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